

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	CASE NO. 8:08CV328
	)	
Plaintiff,	)	
	)	
vs.	)	<b>ANSWER TO VERIFIED</b>
	)	<b>COMPLAINT FOR FORFEITURE</b>
\$110,400 IN UNITED	)	
STATES CURRENCY,	)	
	)	
Defendant.	)	

**COMES NOW** Claimant Sean Washburn and for his answer provides the following:

1. Paragraph One is admitted.
2. Paragraph Two is admitted.
3. Paragraph Three is admitted.
4. Paragraph Four is admitted.
5. Paragraph Five is admitted.
6. Paragraph Six is admitted.
7. Paragraph Seven is denied including subparts a. through q.
8. Paragraph Eight is denied.

**AFFIRMATIVE DEFENSE**

Plaintiff lacks probable cause for the belief that a substantial connection exists between the money to be forfeited and the exchange of a controlled substance for the institution of this forfeiture suit.

**SECOND AFFIRMATIVE DEFENSE**

The Defendant money was not used in violation of 21 U.S.C. § 881 or any other related statute and can be traced to legitimate earnings and proceeds.

**WHEREFORE**, Claimant Sean Washburn prays that Plaintiff's Complaint be denied in all things and for any further relief to which claimant may be entitled including attorney fees.

SEAN WASHBURN, Claimant

BY: s/Jason E. Troia  
JASON E. TROIA, #21793  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2008, I electronically filed the foregoing Answer to Verified Complaint for Forfeiture with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Nancy A. Svoboda, Assistant United States Attorney

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Jason E. Troia  
JASON E. TROIA, #21793  
Attorney for Claimant